

SOUTHERN DISTRICT OF OHIO

United STATES OF AMERICA
Plaintiff


CASE NO. 02-CR-00100

Judge Walter Rice

VS

JOVANNI F. MANGOTTI
DEFENDANT, PRO-SEMOTION FOR REVOCATION
HEARING PURSUANT TO
PETITION FOR REVOCATION

NOW comes the defendant, JOVANNI F. MANGOTTI, by and through pro-se who respectfully moves this COURT for a Report date on the Petition filed by the UNITED STATES probation office to revoke the defendant's supervised release.


JOVANNI F. MANGOTTI
Defendant pro-se

Memorandum IN Support

Defendant was apprehended on a Federal warrant issued by this court on August 27th 2007, and he remains in the custody of the U.S. Marshall's service from that date to the date of the filing of this motion, the original petition for warrant was issued for an aggravated assault charge out of Warren County, Ohio, which was later dismissed by the

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WARREN County Authorities, as well as a violation for being unsuccessfully discharged from community control center (Talent House). Due to dismissal of the assault charges, Defendant's Revocation Request was amended by the United States Probation Office, whereas the amendment dismissed the WARREN County assault allegation, but included new [allegation of] Indictments against the defendant for passing bad checks, Forgery, and Forgery of an Identification Card.

Defendant at the time of the allegation had no idea what the basis of the charges were, and again agreed with the Courts and his attorney to attempt to resolve the WARREN County issue prior to the Federal Courts Resolution on the Revocation hearing, whereas the defendant has finally just recently been informed of the charges as a whole by WARREN County including the Discovery and Particulars, and now that the defendant has been made aware he is requesting this Court to set a date in the immediate future to allow the defendant to move forward with the Federal Proceedings against him.

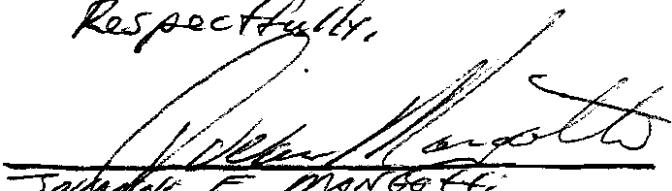
The defendant contends that he was willing to enter a plea with the state; but was ~~advised~~ advised by both his state attorney and Federal attorney that due to complicated statutes, the state was not prepared to move forward until the Federal Courts were complete, and/or advisement was detrimental in my sentencing phase of ~~the~~ defendant's

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State case, leaving the state attorney in a position to request an indefinite continuance in the state case.

Defendant asserts that he has been in the U.S. Marshalls Custody for a period of 9 (nine) months, on the violations, and has now only learned the nature of the charges against him in Warren County, and is prepared to move forward Federally, and after such lengthy delay the defendant feels future delays could only lead to multiple continuances by both the Federal and State Courts, therefore the Defendant Requests This Court For the earliest possible date to conclude the defendants Revocation hearing.

Respectfully,


Joseph F. Mangotti
Defendant pro-se
2042 N. County Rd. 25-A
Croy Ohio 45373